

Docket 05-231

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February 7, 2014

Received & Inspected

FEB 21 2014

FCC Mail Room

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Wheeler:

We are writing to urge the Federal Communications Commission (Commission) to work with video program distributors to improve the synchronization of closed captioning with the related video programming, to assist the hearing impaired. According to U.S. Census data, approximately 3.5% of the population (over 10.5 million people) are hearing impaired, and nearly 15% of people over the age of 65 are hearing impaired (an estimated 6.2 million people). For many people with hearing difficulty, electronic devices can be helpful when adjusted to hear voices and noises in direct conversations. However, these devices are not always able to adequately process electronic sources, including TV broadcasts.

Congress required video program distributors, including Multichannel Video Program Distributors, cable operators and broadcasters, to provide closed captioning, i.e., the visual display of the audio portion of video programming. While the Commission established regulations to carry out this mandate, the regulations do not appear to address the issue of synchronization.

Television programming closed captions and subtitles are not always sufficiently synchronized with the video, which can result in a very fragmented viewing experience for persons with disabilities. On October 27, 2010, the Commission published a report that examined and analyzed digital closed captioning complaints received by the Commission (Report On Digital Closed Captioning Informal Complaints: Review And Analysis May 2009 - May 2010). This report found that problems observed with closed captioning included: delayed captions, garbled or dropped characters, words or caption lines, and captions being displayed too briefly.

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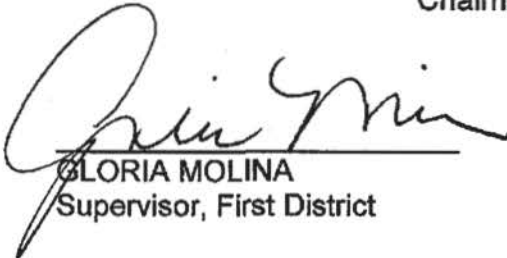
We strongly urge the Commission to work with all video program distributors to improve the synchronization of closed captioning for the hearing impaired. We also suggest that the Commission examine the regulatory schemes of Canada and the United Kingdom. These regulatory schemes include standards and metrics for speeds of captioning during pre-recorded, live and children's programming. They also include standards for presentation, timing and synchronization, in addition to lag time between the audio and captions. Further, they provide standards for the accuracy rates for pre-recorded and live programs, as well as requirements for video program distributors to monitor and report on those rates.

We would appreciate your examination and action on this important issue.

Sincerely,



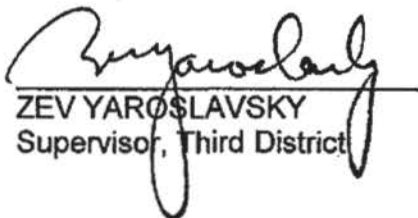
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